oldmanwatershed.ca

A Coal Development Policy for Alberta:

Submission to Coal Policy Committee

July 23, 2021

Introductions

Doug Kaupp
Chair
City of Lethbridge

Andy Hurly
Vice Chair
University of Lethbridge

Henk De Vlieger
Member at Large

Shannon Frank
Executive Director

Acknowledge Treaty 7 Territory and pay respects to the Blackfoot & Metis People

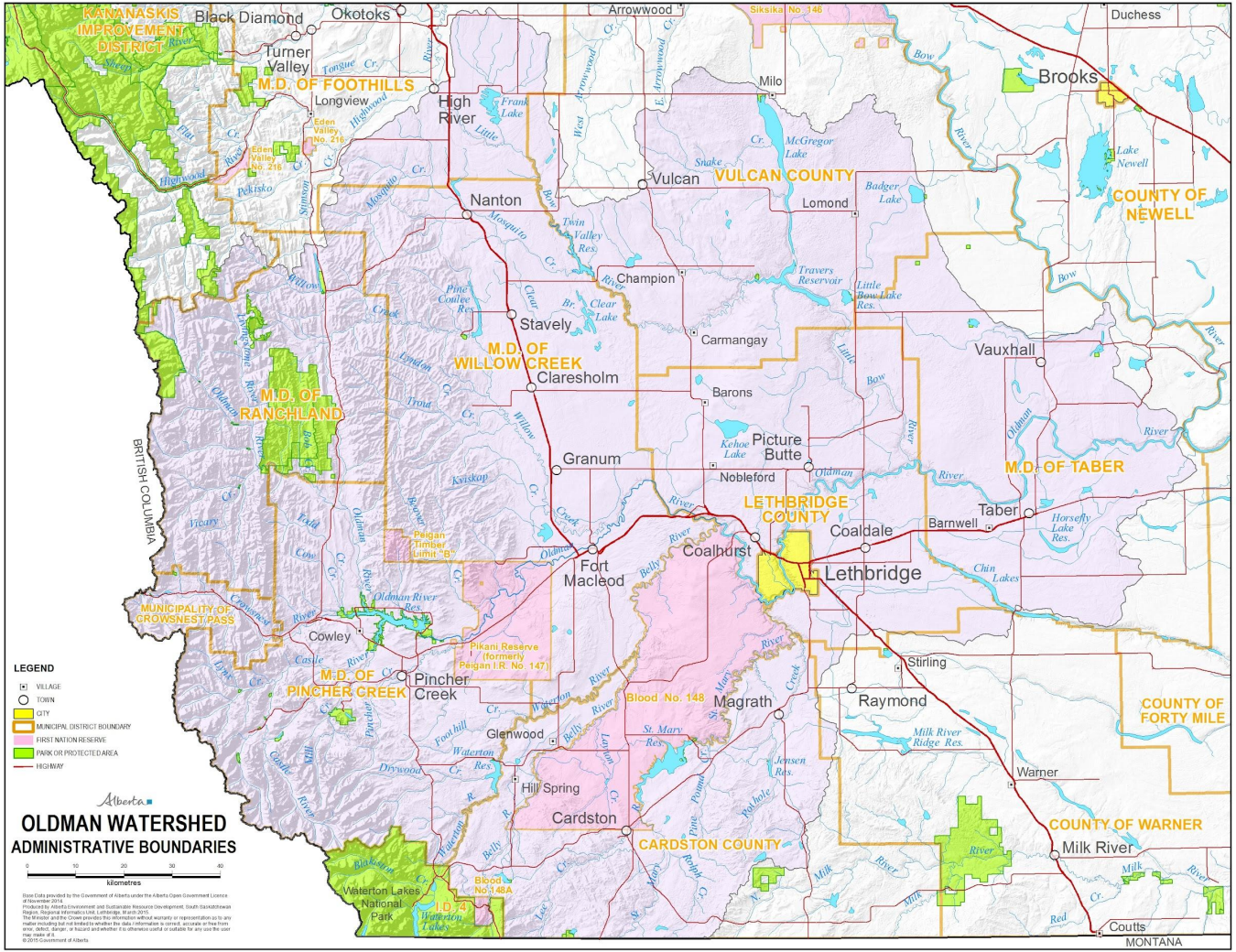
What is your organization’s background, experience and interest in relation to potential coal exploration and development in Alberta?

About OWC

Nonprofit, neutral collaborative forum

The Oldman watershed

200,000 people live here



19 seats on Board of Directors

Many sectors bringing diverse perspectives

A trusted source of information for stakeholders and decision makers

Providing public information, feedback to government, active participant in consultation processes.

Primary concern we have heard is need for environmental protection.

Views are diverse, but everyone supports clean water.

Acknowledge economic benefits are an important consideration for decision makers.

What are the concerns that your community or organization has about current, or future, coal developments, including positive or adverse impacts?

Importance of the headwaters cannot be overstated

Cumulative Effects - Recommendation 1

A fulsome cumulative effects assessment is needed to better identify and quantify the potential impacts of coal mines on the landscape, and to take into account that the headwaters are already impacted by existing land uses.

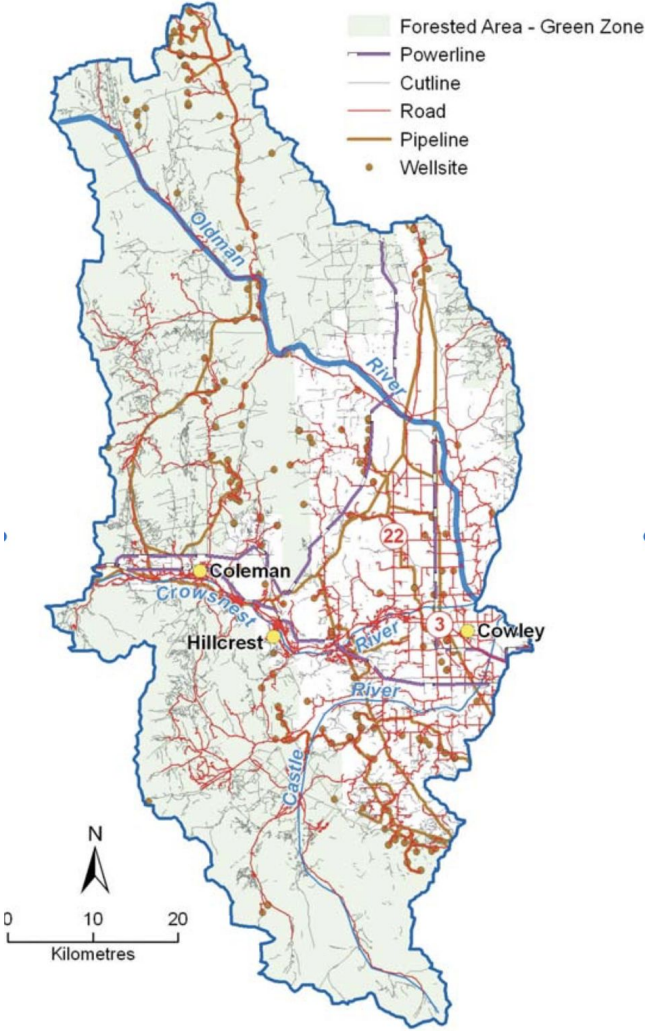
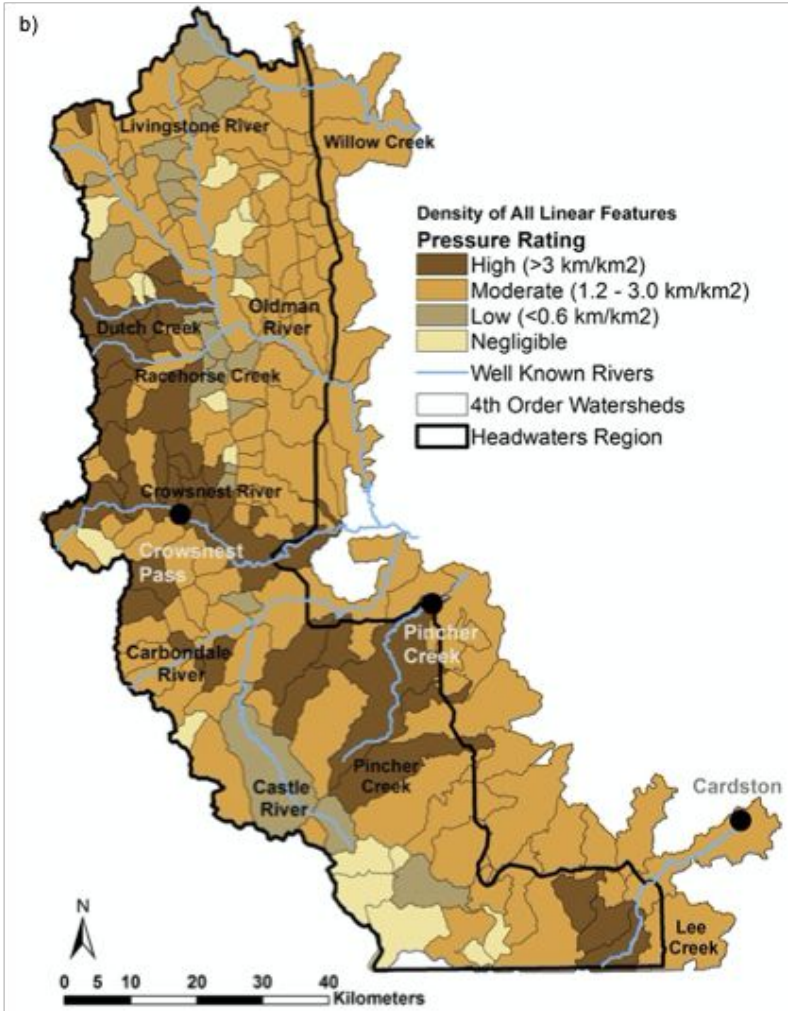


Figure 2.7: Land Use in the Mountain Sub-basins



Linear footprint density - Recommendation 2

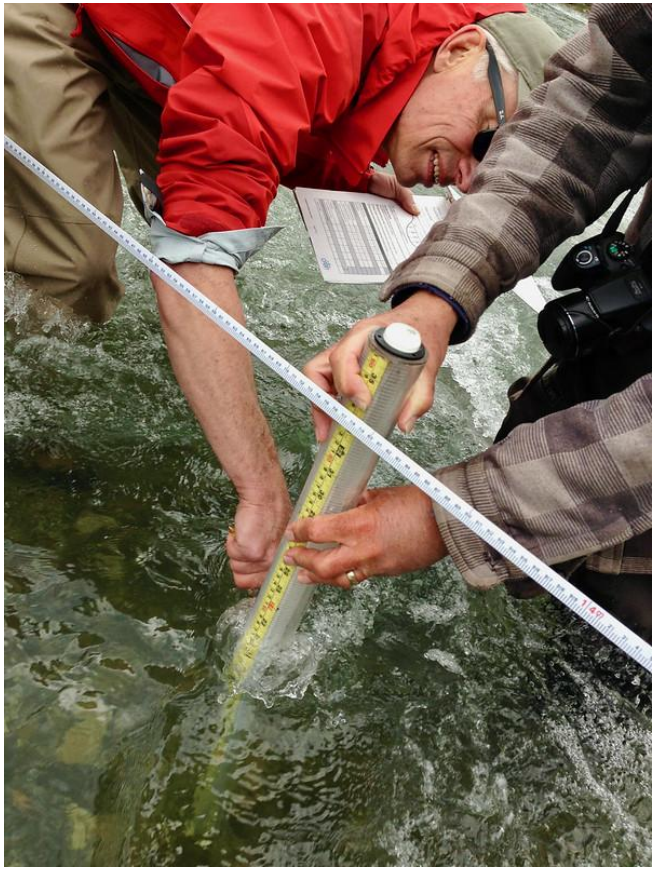
Ensure coal mine companies adhere to the linear footprint density limits (and spatial human footprint thresholds once developed) within the Livingstone and Porcupine Hills Land Footprint Management Plan.

Water pollution is a known issue with coal mining that has not been solved

Selenium - Recommendations 3 & 4

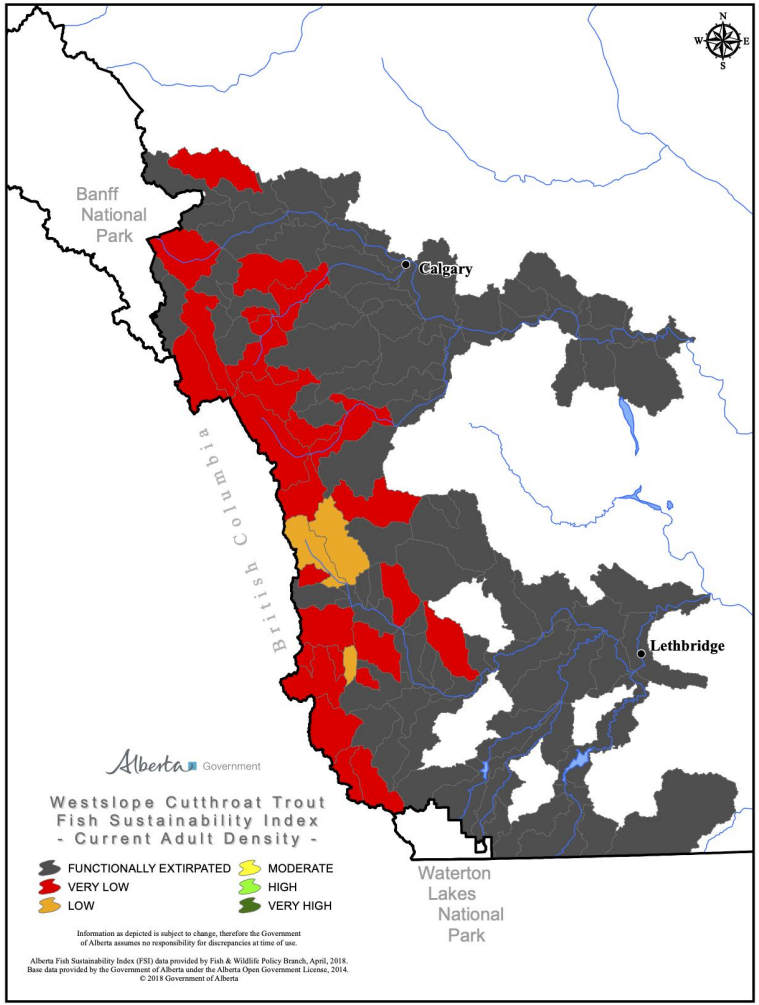
Prior to coal mine approval, ensure selenium (and other contaminants) can be successfully removed from wastewater and will not contaminate natural water bodies, by requiring further scientific research and validation on the effectiveness of water quality treatment over the life of a coal mine (15-25 years), and after mine closure.

In case of unforeseen challenges with wastewater treatment, a modelling exercise should be completed to illustrate what selenium levels could be under various scenarios, and how far downstream contamination could travel.



Sedimentation - Recommendation 5

Regulations should be changed to ensure impoundment structures are designed, engineered and installed to withstand enormous precipitation and melting events, well above historical records as climate change is anticipated to cause more extreme weather events.



Native fish - Recommendation 6

Do not allow coal mining in watersheds where it will harm endangered native fish species or their critical habitat.

Water quantity - Recommendation 7

Complete instream flow needs assessments (including habitat needs for aquatic species at risk) for all streams that may be dewatered, and ensure coal mines do not withdraw more than the aquatic ecosystem can sustain while remaining healthy (as determined by the assessment).

Challenges in dry years - Recommendation 8

Coal mine companies should be required to develop climate change preparedness plans that include planning for multi-year drought.

Climate change - Recommendation 9

Impact Assessments should detail the project's greenhouse gas emissions and strategies to minimize and/or eliminate them.

Groundwater - Recommendation 10

Groundwater monitoring and response plans must be scientifically valid, and establish a baseline, so that possible contaminants are detected and addressed quickly.

Biodiversity - Recommendations 11 & 12

Protect critical wildlife habitat and corridors, and endangered ecosystems from coal development (locate mines in areas that are not critical to wildlife, or part of an endangered ecosystem).

Begin to incorporate ecosystem accounting into our financial systems and Impact Assessments.

Impacts on other Water Users and Sectors

Municipalities are vulnerable to pollutants and have no other water source.

Agriculture and irrigation are the foundation of our economy in southwest Alberta and cannot be put at risk.

Municipalities and Agriculture - Recommendation 13

Long term research, mine-scale testing, and stream monitoring must prove that coal mine wastewater treatment is effective for the long term (15-25 year life of a mine plus for decades after mine closure) before mining is approved, to ensure the water supply for municipalities and agriculture downstream will not be contaminated.

Reputational Risk - Recommendation 14

Evaluate Alberta's potential reputational risks and lost opportunity costs of approving new coal mines, and use the results of the evaluation to assist with determining a new Coal Policy.

In light of points #1 and #2, what are your concerns about the current 1976 Coal Policy?

Specifically:

a. What elements of the 1976 Coal Policy need to be retained, changed or improved?

b. What elements of the 1976 Coal Policy need to be eliminated?

Retain from 1976 Coal Policy - Recommendation 15

Retain the many environmental protections within the policy, and add new sections to facilitate the recommendations provided above.

Improve the 1976 Coal Policy - Recommendation 16

Improve:

- Public participation in the regulatory process;
- Language to commit to a transparent, inclusive, accountable, and easily accessible regulatory system;
- Security deposits for reclamation;
- Land classification categories to reflect a robust cumulative effects assessment; and;
- Regulations related to habitat offsetting.

Eliminate from 1976 Coal Policy - Recommendation 17

Eliminate outdated process information and replace it with the new process, and highlight opportunities for public participation.

Questions and discussion